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*Attorney for Claimant*  
*Karyn Charmbury*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re  
PG&E CORPORATION, a California corporation,  
and  
PACIFIC GAS AND ELECTRIC COMPANY,  
INC., a California corporation  
Debtors.

**Bankruptcy Case No. 19-30088 (DM)**

**Chapter 11**

**(Lead Case) (Jointly Administered)**

**DECLARATION OF CLAIMANT  
KARYN CHARMBURY'S COUNSEL  
IN SUPPORT OF OPPOSITION AND  
RESPONSE TO REORGANIZED  
DEBTORS' ONE HUNDRED  
EIGHTEENTH OMNIBUS  
OBJECTION TO CLAIMS  
(CHARMBURY CLAIMS); with  
certificate of service attached**

Date: November 30, 2022  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102  
(by tele/videoconference only)

I, Donald W. Ullrich, Jr., declare:

My name is Donald W. Ullrich, Jr. I represent the claimant Karyn Charmbury. I am duly admitted to practice law in all of the courts of the State of California and am also admitted to practice law before the United States District Court, Northern District of California, including this court. If called upon to testify as to the matters set forth herein I would do so competently and

1 with personal knowledge thereof.

2 Attached hereto are Exhibits A through AA. Each exhibit is a true and correct copy of an  
3 original document.

4 Counsel for claimant accepted four counter-offers from debtors each in the amount \$11,000.00  
5 for a total of \$44,000.00. See Exhibit T. Debtors have failed to honor these acceptances. No  
6 settlement funds have never been tendered to claimant by debtors. It appears that debtors act as if  
7 only two counter-offers were accepted for a total of \$22,000.00. See Exhibit X.

8  
9 EXHIBIT A

10 Initial proof of claim. Amount of claim \$199,500.00. Dated submitted October 19, 2019.

11 EXHIBIT B

12 Email from Prime Clerk October 19, 2019, re Exhibit A attaching proof of claim as received.

13 EXHIBIT C

14 Amended proof of claim. Amount of amended claim \$520,517.08. Date submitted October  
15 19, 2019. [Comment by counsel: counsel made an error in calculating net present value re  
16 damages in the initially submitted claim.]

17  
18 EXHIBIT D

19 Email from Prime Clerk October 20, 2019, re Exhibit C attaching proof of claim as received.

20 EXHIBIT E

21 Summary of claims as provided by Prime Clerk as of November 6, 2021. Obtained by counsel  
22 per settlement and revised settlement offers made by debtors and as accepted by claimant.

23  
24 EXHIBIT F

25 Offer Notice March 3, 2021. Proof of claim number 65553. ADR Settlement Number  
26 779000101184449. Settlement Offer \$5,000.00. Countered at \$25,000.00.

27 EXHIBIT G

28 Offer Notice March 3, 2021. Proof of claim number 65553. ADR Settlement Number

1 779000101184447. Settlement Offer \$5,000.00. Countered at \$25,000.00.

2 EXHIBIT H

3 Offer Notice March 3, 2021. Proof of claim number 60152. Claim Support ID (sic) Number

4 779000101184452. Settlement Offer \$5,000.00. Countered at \$25,000.00.

5 EXHIBIT I

6 Offer Notice March 3, 2021. Proof of claim number 60152. Claim Support ID (sic) Number

7 779000101184453. Settlement Offer \$5,000.00. Countered at \$25,000.00.

8 EXHIBIT J

9  
10 Emails from Prime Clerk March 24, 2021, re Exhibits F, G, H, and I re counter-offers as  
11 received.

12 EXHIBIT K

13 Email from counsel to Prime Clerk May 11, 2021, re non-response to counter-offers.

14 EXHIBIT L

15 Email from Prime Clerk to counsel May 12, 2021, in response to counsel's email to Prime  
16 Clerk of May 11, 2021, stating that it is not permitted to provide legal or financial advice.

17 EXHIBIT M

18  
19 Revised Settlement Offer May 19, 2021. Proof of claim 60152. ADR Settlement Number  
20 779000101231477. Amount \$10,000.00.

21 EXHIBIT N

22 Revised Settlement Offer May 19, 2021. Proof of claim 65553. ADR Settlement Number  
23 779000101231476. Amount \$10,000.00.

24 EXHIBIT O

25  
26 Email from Prime Clerk June 2, 2021, re receipt of counter-offers by claimant in the amount  
27 \$20,000.00 as to Exhibits M and N. [Comment by counsel: there were four settlement offers but  
28 here the number went down to two settlement offers without explanation by Prime Clerk.]

1 EXHIBIT P

2 Revised Settlement Offer June 9, 2021. Proof of claim 65553. ADR Settlement Number  
3 779000101307024. Amount \$11,000.00.

4 EXHIBIT Q

5 Revised Settlement Offer June 9, 2021. Proof of claim 60152. ADR Settlement Number  
6 779000101307025. Amount \$11,000.00.

7 EXHIBIT R

8 Revised Settlement Offer June 9, 2021. Proof of claim 65553. ADR Settlement Number  
9  
10 779000101307026. Amount \$11,000.00.

11 EXHIBIT S

12 Revised Settlement Offer June 9, 2021. Proof of claim 60152. ADR Settlement Number  
13 779000101307028. Amount \$11,000.00.

14 EXHIBIT T

15 Emails from Prime Clerk June 23, 2021, re receipt of revised settlement offer acceptances by  
16 claimant re Exhibits P, Q, R, and S. [Comment by counsel: the number of revised settlement  
17 offers returned to four from two without explanation by Prime Clerk.]

18 EXHIBIT U

19 Email from counsel to Prime Clerk October 3, 2021, with attachments requesting status of  
20 revised settlement offer acceptances by claimant.

21 EXHIBIT V

22 Email from Prime Clerk to counsel October 4, 2021, stating it is not permitted to provide legal  
23 or financial advice. [Comment by counsel: this is the second such response by Prime Clerk to  
24 inquiry by counsel.] [Comment by counsel: this is not seeking legal or financial advice. Prime  
25 Clerk's objection to provide such information to counsel on this basis is absurd.]

26 EXHIBIT W

1 Email response by counsel to Prime Clerk October 4, 2021, objecting to failure by Prime Clerk  
2 to provide information as to status of claimant's acceptances of revised settlement offers.

3 EXHIBIT X

4 Email from Stacy Campos October 6, 2021, representing debtors inquiring as to the \$22,000.00  
5 (sic) re claimant's acceptances of the revised settlement offers. [Comment by counsel: claimant's  
6 acceptances of the revised settlement offers total \$44,000.00, not \$22,000.00.]

7 EXHIBIT Y

8 Email from counsel to Stacy Campos October 7, 2021, in response to her email of October 6,  
9 2021. [Comment by counsel: there is confusion on the part of counsel since he assumes Ms.  
10 Campos has access to the same records counsel has access to.] [Counsel mistakenly refers to  
11 Prime Clerk as Prime Pay. Prime Pay is a payroll service utilized by counsel at the time.]

12 EXHIBIT Z

13 Email from Stacy Campos to counsel October 7, 2021, in response to counsel's email to her of  
14 October 7, 2021, stating she doesn't work with Prime Pay (sic).  
15

16 EXHIBIT AA

17 Email from counsel to Stacy Campos October 7, 2021, in response to her email to counsel of  
18 October 7, 2021, addressing the role of Prime Pay (sic). [Comment by counsel: he continues to  
19 mistakenly refer to Prime Clerk as Prime Pay.]  
20

21 SERVICE OF OBJECTIONS AND DELAY IN REPONSE.

22 It appears the documents submitted by debtors were sent to counsel's email address via email  
23 at 7:33 PM on October 24, 2022. Counsel is unsure when the documents were mailed to him but  
24 they were mailed respectively to counsel's previous addresses at 3574 D Street, Sacramento, CA  
25 95816-3412 and to P. O. Box 160007, Sacramento, CA 95816. Filed and served concurrently  
26 herewith is counsel's notice of change of address, telephone number, and facsimile number.  
27

28 On October 25, 2022, counsel had hernia surgery scheduled for 7:30 a.m., which surgery took

1 place as scheduled. Counsel did not see said email until the following week. After the surgery,  
2 counsel was prescribed pain medications. Counsel was in no position to be working in his office  
3 until the following week after the surgery and then only on a limited basis. Counsel's post-  
4 operation appointment was scheduled for November 9, 2022, which appointment took place as  
5 scheduled. No complications were noted. Counsel did not feel fully functional until the second  
6 week in November but was still under physical limitation instructions as per his doctor.

7  
8 Counsel is 70 years of age. At the time of counsel's hernia operation and thereafter until he  
9 returned to his office, there was no one in counsel's law office.

10  
11 Dated: November 18, 2022

12 *Donald W. Ullrich, Jr.*  
13 DONALD W. ULLRICH, JR.  
14 Attorney for Claimant  
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**CERTIFICATE OF SERVICE**

My name is Donald W. Ullrich, Jr. My business address is 3100 Zinfandel Drive, Suite 265, City of Rancho Cordova, Sacramento County, California 95670-6391. I am over the age of 18 years and not a party to the within action.

On November 18, 2022, I served a true and correct copy of the attached document via electronic email upon the following named individuals, their respective email addresses stated.

After sending said emails, thereafter I received no electronic notification of a failed or undeliverable electronic transmission:

Jane Kim [jkim@kbkllp.com](mailto:jkim@kbkllp.com)

David A. Taylor [dtaylor@kbkllp.com](mailto:dtaylor@kbkllp.com)

Dara L. Silveira [dsilveira@kbkllp.com](mailto:dsilveira@kbkllp.com)

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: November 18, 2022

*Donald W. Ullrich, Jr.*  
Donald W. Ullrich, Jr.